
DATE: August 23, 2010

REPORT TITLE: **REGIONAL OFFICIAL PLAN AMENDMENT 21A AND 23 - AIR QUALITY, INTEGRATED WASTE MANAGEMENT AND HOUSING POLICIES - PROVINCIAL MODIFICATIONS AND APPEAL**

FROM: Norma Trim, Chief Financial Officer and Commissioner of Corporate Services

RECOMMENDATION

That Staff be authorized and directed to support Regional Official Plan Amendment (ROPA) 23 at the upcoming Ontario Municipal Board (OMB) hearing in 2011 for the purpose of defending the amendment, which introduces new and revised housing policies in the Region of Peel Official Plan;

And further, that staff be directed to participate in discussions with the appellant to seek opportunities to resolve concerns;

And further, that the Region retain the services of external legal counsel, for the purpose of dealing with all Peel Region Official Plan Review (PROPR) amendments under appeal;

And further, that a copy of the subject report be forwarded to the Ministry of Municipal Affairs and Housing (MMAH), the Cities of Brampton, Mississauga, the Town of Caledon and the municipalities adjacent to the Region of Peel.

REPORT HIGHLIGHTS

- Regional Council adopted ROPA 21A and ROPA 23 on November 19, 2009 as part of the Peel Region Official Plan Review (PROPR) process.
- MMAH staff provided Regional staff with proposed Provincial modifications. Following joint discussions and negotiations, the Province released the Provincial modifications by way of a Notice of Decision for ROPA 21A on May 25, 2010 and ROPA 23 on June 22, 2010.
- The Provincial modifications can be characterized as minor edits and clarifications to the Regional Council approved policies.
- In response to the Provincial Notice of Decisions, the Province received one appeal on ROPA 23 from Solmar Development Corporation.
- Staff recommends the use of external legal counsel to defend all PROPR amendments appealed at the upcoming Ontario Municipal Board (OMB) hearing in 2011.

August 23, 2010

REGIONAL OFFICIAL PLAN AMENDMENT 21A AND 23 - AIR QUALITY, INTEGRATED WASTE MANAGEMENT AND HOUSING POLICIES - PROVINCIAL MODIFICATIONS AND APPEAL

DISCUSSION

1. Background

The purpose of this report is to inform Regional Council of the Provincial notice of decision on Regional Official Plan Amendment (ROPA) 21A & 23, which includes minor modifications and to update Regional Council on the appeal of ROPA 23.

On November 19, 2009, Regional Council adopted ROPA 21A under resolution numbers 2009-1261 and 2009-1330 and by By-law 110-2009. ROPA 21A establishes new and revised air quality and integrated waste management policies in the Region of Peel Official Plan. Also, on November 19, 2009, Regional Council adopted ROPA 23 under resolution number 2009-1271 and by By-law 109-2009. ROPA 23 includes new and revised housing policies in the Region of Peel Official Plan. ROPA 21A and 23 were forwarded to Ministry of Municipal Affairs and Housing (MMAH) for approval.

In April 2010, MMAH staff provided draft modifications on ROPA 21A and 23 for the Region to consider. The draft modifications to ROPA 21A and 23 are editorial and minor in nature and do not change the policy direction adopted by Regional Council. Regional staff consulted with area municipal staff during the process of reviewing the draft modifications. Discussions were held between MMAH and Regional staff and a written response was sent to MMAH staff on May 11, 2010 regarding the draft modifications for ROPA 21A. For ROPA 23, a written response on the draft modifications was sent to MMAH staff on May 21, 2010. MMAH staff accepted Regional staff's request to revise several of MMAH's draft modifications to ROPA 21A and 23.

A Notice of Decision was issued by the Province to approve ROPA 21A on May 25, 2010 and ROPA 23 on June 22, 2010 as further modified. Appendix I (ROPA 21A) and Appendix II (ROPA 23) provides the Provincial Notice of Decision. Following the Provincial Notice of Decision, MMAH staff did not receive any appeals on the decision to approve ROPA 21A. However, one written appeal was received on the decision to approve ROPA 23.

2. Overview of Provincial Modifications

The Provincial modifications for ROPA 21A and 23 are discussed below. The Provincially approved amendment and placement and effect of the Provincial modifications are reflected in the link to the draft Official Plan Office Consolidation for ROPA 21A (pages 12-15, 204-211, 243, 247, 249, 252, 257, 260) and ROPA 23 (pages 5, 155-164, 238, 239, 242, 245-247, 253, 254, 257, 259). <http://www.peelregion.ca/planning/rop/rop-july2010.pdf>

a) ROPA 21A – Air Quality and Integrated Waste

Minor modifications were made by the Province. In particular, the Province, to ensure gender neutrality, modified 'man-made sources' of air pollution to read 'human-made sources'.

To ensure consistency with section 1.6.8.1 of the Provincial Policy Statement (PPS), modifications were made by the Province to clarify the need to plan for and accommodate present and future needs and siting waste management facilities in accordance with Provincial legislation and standards. A modification was made by the Province in relation to

August 23, 2010

REGIONAL OFFICIAL PLAN AMENDMENT 21A AND 23 - AIR QUALITY, INTEGRATED WASTE MANAGEMENT AND HOUSING POLICIES - PROVINCIAL MODIFICATIONS AND APPEAL

section 1.7.1.e of the PPS, to ensure sensitive land uses are buffered and/or separated from waste management sites and facilities.

b) ROPA 23 – Housing

A few minor modifications were made by the Province to ensure consistency with PPS section 1.4.1 (replaced “to achieve a” with “to provide for an appropriate range of housing types and densities”). Instead of encouraging the area municipalities to implement annual minimum new housing unit targets, the Province modified the policy for the Region to collaborate with the area municipalities in this regard.

3. Summary of Appeal

Solmar Development Corporation has appealed ROPA 23.

a) Solmar Development Corporation

In a letter dated July 5, 2010, Lynda J. Townsend, of Townsend and Associates, on behalf of Solmar Development Corporation, appealed the decision of the Province to approve ROPA 23. Solmar is concerned with Table 4 and Figure 17 of the plan, which establish annual, minimum new housing unit targets in Peel (Table 4) and the area municipalities (Figure 17). Specifically, Solmar feels the social housing and affordable rental targets are not mutually exclusive because any new affordable rental housing built in Peel is likely to be social housing because affordable rents are not sufficient to cover the capital and operating costs of new rental housing without government subsidies.

Solmar is also concerned about the clear distinction between the market ownership and affordable ownership housing targets. Solmar feels much of the market ownership housing in Peel is affordable ownership housing as defined in ROPA 23. They contend many condominium apartments, semi-detached and row houses, and some small lot single detached homes in Peel are sold at prices meeting the definition of affordable home ownership housing. For further information, please refer to Appendix III which provides the notice of appeal filed by Lynda J. Townsend.

b) OMB Process

ROPA 23 is one of seven separate amendments in the Peel Region Official Plan Review (PROPR). ROPA 20 sustainability and energy policies were appealed in December 2009 by Solmar. Subsequent to that appeal, staff requested the OMB to consolidate all PROPR amendments appealed into one hearing for efficiency purposes. There were no objections to this request. The OMB will schedule a date for a prehearing and subsequently a hearing. Staff anticipates a prehearing will occur in early to middle of 2011.

The OMB will encourage the parties to enter into discussion to resolve issues where possible. It is recommended that Council direct staff to participate in discussions with the appellant to seek opportunities to resolve concerns.

4. Status of other PROPR Amendments: ROPA 21B, 22, 24, and 25

Regional Council adopted ROPA 21B (natural heritage and agriculture) on May 13, 2010; ROPA 22 (transportation) on November 19, 2009; ROPA 24 (managing growth, employment

August 23, 2010

REGIONAL OFFICIAL PLAN AMENDMENT 21A AND 23 - AIR QUALITY, INTEGRATED WASTE MANAGEMENT AND HOUSING POLICIES - PROVINCIAL MODIFICATIONS AND APPEAL

areas, and Greenbelt conformity) on April 22, 2010; and ROPA 25 (performance measurement and Planning Act conformity) on February 11, 2010.

A Notice of Decision was issued by the Province to approve ROPA 25 on August 10, 2010 as further modified. MMAH staff has informed Regional staff that Solmar Development Corporation appealed ROPA 25 and the appeal period ends on August 30, 2010. For ROPA 25, further information about the Province's approval and modifications, Solmar's appeal, and any further appeals will be provided in a future Council report.

ROPA 21B and 24 is currently being reviewed for approval by the Province. Regional staff will determine whether to report to Council once draft modifications are received from the Province, depending on the nature of the comments. Regional staff has received draft modifications from the Province on ROPA 22 and are working with the Province to finalize the modifications.

FINANCIAL IMPLICATIONS

ROPAs 20, 23 and 25 have been appealed to the OMB and further amendments may be appealed. As noted, the OMB has agreed to consolidate all hearings into one for all PROPR amendments that are appealed. This will ensure the efficient use of time and resources. The Region's legal staff recommend that external legal counsel be retained to defend all PROPR amendments appealed to the OMB. Staff is determining the financial implications and will address this issue through the 2011 Capital Plan Budget.

CONCLUSION

As a result of staff consultation and negotiations, the final Provincial modifications can be characterized as editorial and minor in nature. Given that approved ROPA 21A and 23 are consistent with Provincial plans and legislation, staff recommends that the Region defend ROPA 23 which has been appealed to the OMB. Once the August 30, 2010 appeal period ends for ROPA 25, staff will prepare a report on the modifications and appeal for a future Council meeting. Staff recommends that external legal counsel be retained to defend all PROPR amendments that are appealed.

MA-89-5-


August 23, 2010

**REGIONAL OFFICIAL PLAN AMENDMENT 21A AND 23 - AIR QUALITY, INTEGRATED
WASTE MANAGEMENT AND HOUSING POLICIES - PROVINCIAL MODIFICATIONS AND
APPEAL**




Norma Trim
Chief Financial Officer
and Commissioner of Corporate Services

Approved for Submission:



D. Szwarc, Chief Administrative Officer

*For further information regarding this report, please contact Arvin Prasad at extension 4251 or
via email at arvin.prasad@peelregion.ca*

Authored By: John Yeh 

- c. Legislative Services
Manager, Financial Support Unit (FSU)

PPAR GC 10-04

DECISION

With respect to Regional Official Plan Amendment No. 21A Subsection 17(34) of the Planning Act

I hereby approve all of Amendment No. 21A to the Official Plan for the Regional Municipality of Peel, as adopted by By-law No. 110-2009, with the following modifications:

Part B - The Amendment

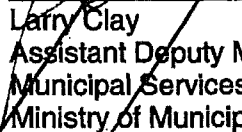
1. **Item #2**, on page 3, as it relates to the second paragraph of **Section 2.2.3 (Air Quality)** is modified by:
 - a. deleting the words “man made” and replacing them with “human”; and
 - b. inserting quotation marks around the term “vulnerable populations.”
2. **Item #2**, on page 4, as it relates to **Subsection 2.2.3.3.1** is modified by inserting commas before and after the words “but not limited to.”
3. **Item #2**, on page 4, as it relates to **Subsection 2.2.3.3.3** is modified by deleting “all levels of government and the private sector” and replacing the phrase with “all levels of government, the private sector and public organizations.”
4. **Item #2**, on page 4, as it relates to **Subsection 2.2.3.3.5** is modified by deleting “all levels of government and the private sector” and replacing the phrase with “all levels of government, the private sector and public organizations.”
5. **Item #4**, on page 5, as it relates to **Section 6.4 (Waste Management)** – the second paragraph is modified by deleting “Peel is also committed to maintaining the Long Term Waste Resource Management Strategy to meet the needs of citizens and businesses.” and replacing it with the following “*The Region is responsible for waste management in Peel and is committed to maintaining the Long Term Waste Resource Management Strategy to appropriately plan for and accommodate the present and future needs of citizens and businesses.*”
6. **Item #9**, on page 6, as it relates to **Section 6.4.2** policies is modified by inserting the following new subsections 6.4.2.1 and 6.4.2.2 and subsequently renumbering the following subsections accordingly:

“**6.4.2.1** Locate and design *waste* management sites and facilities in accordance with provincial legislation and standards.

6.4.2.2 Plan and develop *waste* management sites and facilities to ensure sensitive land uses are buffered and/or separated to prevent adverse effects from odour, noise and other contaminants, and to minimize risk to public health and safety.”

7. **Item #12**, on page 6, as it relates to renumbered **subsection 6.4.2.6** (formerly subsection 6.4.2.4) is modified by:
- inserting the words “management sites and” after the words “to permit waste”; and
 - inserting the words “management sites and” after the words “development of waste.”
8. **Item #14**, on page 6; as it relates to **Section 6.4.2** policies are modified by inserting the following **new subsection 6.4.2.12** after the renumbered subsection 6.4.2.11 (formerly subsection 6.4.2.9) and subsequently renumbering the following subsections accordingly:
- “6.4.2.12** The *Region* and the area municipalities will consult with the Ministry of Environment’s Renewable Energy Approvals Section regarding possible Renewable Energy Approval requirements prior to the expansion of an existing, or the development of a new, waste management facility that produces energy from renewable sources.”
9. **Item #14**, on page 6, regarding renumbered **subsection 6.4.2.16** (formerly 6.4.2.13) is modified by deleting “in appropriate locations” and replacing the phrase with “where appropriate.”
10. **Item #16**, on page 9, regarding the “**municipal hazardous or special waste**” definition under **Glossary** is modify by deleting the reference to Ontario Regulation “542106” and replacing it with “542/06.”

Dated at Toronto this 21st of May, 2010.



 Larry Clay
 Assistant Deputy Minister (A)
 Municipal Services Division
 Ministry of Municipal Affairs and Housing

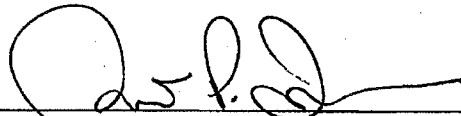
DECISION
With respect to an Official Plan
Subsection 17(34) of the Planning Act

I hereby approve Regional Official Plan Amendment No. 23 to the Region of Peel Official Plan adopted by By-law No.109-2009, with the following modifications:

1. **Item #3 regarding Policy 5.8.1.1** is modified by:
 Deleting the words "To achieve a," and replacing with the words "To provide for an appropriate," in the first line; and deleting the word "and" after the word "needs," in the second line.
2. **Item #19 regarding Policy 5.8.2.13** is modified by:
 Deleting the word, "Encourage" and replacing it with "Collaborate with" in the first line.
3. **Item #21 regarding Policy 5.8.3.2.6** is modified by:
 Adding the words, "and support" after the word, "Encourage" and by adding the words, "existing and" before the word, "residential".
4. **Item #24 regarding Policy 5.8.6.2.3** is modified by:
 Deleting the words, "a range of housing options." and replacing them with the words, "the development of housing which meets the social, health and well-being requirements of current and future residents."
5. **Item #27 regarding the Glossary definition of "Intensification"** is modified by:
 Deleting the following words from part d): "such as apartments or other accommodation in houses".
6. **New Item #38 is to be added as follows:**

"38. Policy 1.3.4 Organization of Chapters is amended by adding the following after the last sentence: "The definition of terms provided in Provincial Plans and the Provincial Policy Statement applies to those terms that are used in the Region of Peel Official Plan, unless otherwise identified in the Glossary section of the Region of Peel Official Plan."

Dated at Toronto this 16 of June, 2010.



Robert P. Taylor
 Assistant Deputy Minister,
 Municipal Services Division
 Ministry of Municipal Affairs and Housing

MA-89-9

Appendix III
Regional Official Plan Amendment Number 21A and 23 -
Air Quality, Integrated Waste Management and Housing
Policies – Provincial Modifications and Appeal
July 16, 2010

TOWNSEND AND ASSOCIATES

BARRISTERS AND SOLICITORS

LYNDA J. TOWNSEND PROFESSIONAL CORPORATION

PLEASE REFER TO:
Lyn Townsend (Ext. 222)
Email: lyn.townsend@ltownsend.ca
Assistant: Kate King (Ext. 221)
E-mail: kate.king@ltownsend.ca

July 5, 2010

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
777 Bay Street, Second Floor
Toronto, Ontario
M5G 2E5

Attention: Ms. Louis Biondi, Planner

Dear Madam:

Re: **NOTICE OF APPEAL**
ROPA 23 to the Regional Municipality of Peel Official Plan
Solmar Development Corporation

We represent Solmar Development Corporation with respect to its land holdings within the Town of Caledon. We hereby appeal Regional Official Plan Amendment No. 23 of the Peel Regional Official Plan to the Ontario Municipal Board, pursuant to section 17(36) of the *Planning Act*, R.S.O. 1990, c. P.13.

On July 7, 2009 and on September 14, 2009, comments on the proposed ROPA 23 were submitted by Ms. Jeannette Gillezeau of Altus Group on behalf of our client. Both of those letters are attached hereto and to the extent that they have not been addressed in the approved amendment, form the basis for our appeal.

Without detracting from the significance of all of the reasons set out in the attached correspondence, of particular concern is the distinction between "social housing", "affordable rental", etc., established by Table 4 and Figure 17. It is unclear whether either Table 4 or Figure 17 constitute enforceable components of the Regional Official Plan. However, due to the direction in which they steer housing policy in the Region, we maintain our objection thereto and their inclusion in the document. Furthermore, comments provided by the Region on our submissions indicated that detailed descriptions of each of the housing categories found in Table 4 are to be determined during the policy implementation stage. This approach creates uncertainty for the public and does not provide the clarity expected of an Official Plan and does not address the public consultation requirements of the Official Plan and of the *Planning Act*.

MA-B9-10

Appendix III
Regional Official Plan Amendment Number 21A and 23 -
Air Quality, Integrated Waste Management and Housing
Policies – Provincial Modifications and Appeal
July 16, 2010

NOTICE OF APPEAL

ROPA 23

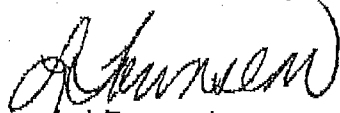
~~July 6, 2010~~

Page 2 of 2

Enclosed, please find OMB Form A1 and the required \$125 appeal fee. Should you have any questions or concerns with respect to this Notice, please do not hesitate to contact the undersigned.

Yours truly,

TOWNSEND AND ASSOCIATES



Lynda J. Townsend

cc. Client

Ms. Jeannette Gillezeau, Altus Group

Mr. Paul Lowes, Sorensen Gravely Lowes Planning Associates Inc.



Independent Real Estate Intelligence

July 7, 2009

Mr. John Yeh, Planner
 Planning Policy and Research Division
 Regional Municipality of Peel
 10 Peel Centre Drive, Suite A, 6th Floor
 Brampton, Ontario L6T 4B9

Dear Mr. Yeh;

Subject: Peel Region Housing Strategy
 Our File: P-4136

We have reviewed the *Draft Housing Strategy*, ROPA 23 and the various discussion papers prepared as part of the Peel Region Official Plan Review. In April, we provided comments regarding the draft Official Plan Housing Policies and we appreciate the opportunity to provide comments regarding the *Draft Housing Strategy*.

Key Issues

The *Draft Housing Strategy* identifies a number of key housing issues including:

- A diverse housing supply is needed to ensure housing choice and affordability;
- A sufficient supply of land for residential development is needed to meet projected population growth targets;
- There is a lack of ownership housing affordable to low and moderate income households; and
- There is a need for more complete communities which provide a mix of land uses and support transit (pages iii and iv).

The *Draft Housing Strategy* and discussion papers include valuable statistics which demonstrate the importance of these issues.



John Yeh
 July 7, 2009
 Page 2

Housing Needs

On page 17, the *Draft Housing Strategy* states that approximately 6,000 new housing units per year will be needed annually to accommodate Peel population growth targets. As we noted in our April letter, the *Growth Outlook for the Greater Golden Horseshoe* is the only set of common, co-ordinated housing forecasts that has been prepared for the Greater Golden Horseshoe. Significantly more than 6,000 new housing units per year will be required to meet Peel's housing needs, potentially up to 8,000 per year after 2011.¹

The *Draft Housing Strategy* seems to be premised on the current forecasts in the *Peel Region Official Plan* including the 2021 forecast for Caledon. These forecasts do not conform to the *Growth Plan*. A more appropriate and realistic analysis of housing supply should have been based on the overall Schedule 3 forecasts in the *Growth Plan*.

Adequacy of the Caledon Housing Supply

On page 20, the *Draft Housing Strategy* states that Caledon currently has a ten year supply of land available for residential development. The housing data presented in *Discussion Paper 1: Housing Availability Throughout the Life-Cycle* (pages 89 and 90) is incomplete and the analysis is insufficient to demonstrate that there is sufficient land designated for residential development in Caledon to "maintain at all times the ability to accommodate residential growth for a minimum of 10 years" as required under the *Provincial Policy Statement*. The failure of Caledon to maintain at all times the ability to accommodate residential growth is clearly demonstrated by the sharp fall in construction of new houses in recent years. Over the 2001 to 2004 period, an average of 578 building permits per year were issued for new housing units in Caledon. Over the 2005 to 2007 period, an average of only 116 permits were issued per year (*Discussion Paper 1*, page 88).

Although the *Town of Caledon Official Plan* contemplates a tri-nodal development pattern, with residential growth balanced across the Bolton - South Albion, Mayfield West and Caledon East settlement areas, this has not been reflected in the designation of land for residential development or the allocation of population growth in Caledon's OPA 203. The allocation of

¹ *Discussion Paper 1: Housing Availability Throughout the Life-Cycle*, page 92 states that Peel would need to produce an average of 7,000 units annually to meet projected population by 2021. This forecast is also well short of the household forecast for Peel in the *Growth Outlook for the Greater Golden Horseshoe*.



John Yeh
July 7, 2009
Page 3

growth to Caledon's settlement areas should reflect the need to maintain "at all times" a minimum ten year supply of land designated and available for residential development and a minimum 3 year supply in draft approved and registered plans of subdivision. The planning and approval process for settlement area expansions and secondary plans may take many years. Lands were not designated for residential development in Mayfield West until the supply of housing in Bolton was exhausted, which resulted in the housing shortage apparent in the data presented in the *Draft Housing Strategy* discussion papers.

Planning for concurrent growth in all three settlement areas is necessary to avoid housing supply bottlenecks such as that caused by the combination of servicing constraints in Caledon East and exhaustion of the residential land supply in Bolton. The amount of growth allocated to the Bolton-South Albion settlement area should be significantly higher than the allocation proposed in Caledon's OPA 203. Sufficient lands must be designated and made available for residential development in the Bolton - South Albion settlement area to ensure that Caledon maintains at all times the housing supply required under the *Provincial Policy Statement*.

Affordable Ownership Housing

Despite data proving that market housing can be affordable for moderate income households, the *Draft Housing Strategy* appears to imply that affordable housing is equivalent to social housing and must be provided by governments or non-profit agencies. Data included in the *Draft Housing Strategy* proves that this is not necessarily true, particularly when there is a sufficient supply of residential land to ensure a competitive housing market.

The "affordable" price for ownership housing in Peel Region is \$307,000, based on the definition in the *Provincial Policy Statement* (page 27). The average price of resale semi-detached and row houses in Peel Region is \$305,000, which means that a significant number of semi-detached and row houses are sold at prices below \$305,000. The average price of resale condominium apartments in Peel Region is \$227,600 per unit, well within the range affordable for moderate income households (page 25).

As the housing supply in the Town of Caledon has become constrained in recent years, housing in the Town has become much less affordable (*Discussion Paper 1*, page 72). Prior to 2002, the average resale price of single-detached houses in Caledon was below \$300,000 and the average resale price of semi-detached and row houses and condominium apartments was below



John Yeh
 July 7, 2009
 Page 4

\$200,000. Since that time, prices in Caledon has increased substantially. While the average prices of resale semi-detached, row and condominium units in Caledon were still below the affordable price in 2008 (\$307,000), the average price of resale single-detached houses in Caledon was almost \$500,000. The average price of new single-detached houses in Caledon exceeded \$1 million in 2008 (Discussion Paper 1, page 75).

There is a direct relationship between the deterioration of housing affordability in Caledon and the supply of land available for residential development. With building permits being issued for an average of only 116 new housing units per year over the 2005 to 2007 period, the Caledon housing market is no longer competitive. Caledon's OPA 203 would limit residential development in Bolton – South Albion over the 2009 to 2021 period to intensification, which will shelter Mayfield West developers from the competition needed to improve housing affordability in Caledon.

The *Draft Housing Strategy* needs to clearly indicate that a competitive housing supply is a key determinate in providing affordable ownership housing.

Regional Government Role

The *Draft Housing Strategy* recognizes that private land owners and developers are the primary mechanism for meeting the majority of housing needs in the Region (page 52). The Regional government role in meeting current and future housing needs should reflect this reality and include:

- Facilitating planning approvals for affordable housing developments, including the types of ownership housing which can be affordable for moderate income households (condominium apartments, semi-detached and row houses, and small lot single-detached houses);
- Reducing the costs imposed by the Region on the construction of new houses (e.g. development charges, development standards, etc.); and
- Ensuring sufficient land is designated for residential development to provide the competitive market needed to keep housing affordable.

These strategies are identified in *Tools and Practices to Address Housing Issues*, but they do not appear to have been carried through into the *Draft Housing Strategy*.



John Yeh
July 7, 2009
Page 5

ROPA 23

ROPA 23 contains many valuable and innovative policies for achieving affordable housing. Although it refines the policies with respect to three-year and ten-year supply, it does not make the very key observation on the necessity of a competitive housing supply. We recommend that a policy be added to Section 5.5.2 which states that, "Collaborate with the area municipalities to ensure that a sufficient supply of land is designated for housing within the built boundary and within the designated greenfield area to ensure a competitive housing market while promoting a compact form of development".

Sincerely,

Jeannette Gillezeau, MA
Senior Director
Economic Consulting

cc: Maurizio Rogato

Independent Real Estate Intelligence



September 14, 2009

Mr. John Yeh, Planner
 Planning Policy and Research Division
 Region of Peel
 10 Peel Centre Drive
 Suite A, 6th Floor
 Brampton, Ontario L6T 4B9

Dear Mr. Yeh:

Subject: ROPA 23
 Our File: P-4136

We have reviewed the proposed Regional Official Plan Amendment 23 dated May 11, 2009. We appreciate the opportunity to provide comments regarding the proposed changes to Peel Region's Housing Policies. This letter is intended to supplement our July 7, 2009 letter regarding the draft Housing Strategy.

We have a number of concerns with Table 4 – Annual Housing Targets for Peel. Table 4 appears to assume there is a clear distinction between social housing and affordable rental housing, while these terms are not mutually exclusive. Any new affordable rental housing built in Peel is almost certain to be social housing because affordable rents are not sufficient to cover the capital and operating costs of new rental housing without government subsidies. Furthermore, the definition of social housing in the Peel Region Official Plan does not appear to provide for any type of housing other than affordable rental housing.

Table 4 also appears to assume there is a clear distinction between market ownership and affordable ownership. However, the background research undertaken for the Regional Housing Strategy showed that much of the market ownership housing in Peel Region is affordable ownership housing as defined in ROPA 23. Many condominium apartments, semi-detached and row houses, and some

John Yeh
September 14, 2009
Page 2


small lot single detached houses in Peel Region are sold at prices that meet the definition of affordable ownership housing.

As I noted in my July 7th letter, there is a direct relationship between the rapid deterioration of housing affordability in the Town of Caledon and the supply of land available for residential development. Although ROPA 23 refines the Official Plan policies with respect to three-year and ten-year supply, it does not sufficiently acknowledge the necessity of a competitive housing supply. We recommend that the following policy be added to Section 5.5.2 of the Peel Region Official Plan:

Collaborate with the area municipalities to ensure that a sufficient supply of land is designated for housing within the built boundary and within the designated greenfield area to ensure a competitive housing market while promoting a compact form of development.

I hope these comments are useful in finalizing new housing policies for the Region of Peel Official Plan.

Sincerely,



Jeannette Gillezeau, MA
Senior Director
Economic Consulting

cc: Maurizio Rogato